IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

VISHVA DESA others similarly	I, on behalf of herself and situated,	No. 1:11-cv-1925
v. `	Plaintiff,	Judge Bucklo Magistrate Judge Keys
ADT SECURIT	Y SERVICES, INC., Defendant.	
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AFFIDAVIT OF HANNAH LIM

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared HANNAH LIM, who upon being duly sworn, deposes and says as follows:

- My name is Hannah Lim. I am over 18 years of age and not a party to this action.
 I have personal knowledge of the matters contained in this Affidavit.
- 2. I am Vice President and Chief Litigation Counsel for ADT LLC d/b/a ADT Security Services, f/k/a ADT Security Services, Inc. ("ADT").
- 3. In my capacity as Vice President and Chief Litigation Counsel, I manage major litigation involving ADT. I have knowledge of the underlying class action against ADT, the settlement of the class claims, and the prosecution of ADT's third party complaint against Elephant Group, Inc. ("Elephant Group"), including the costs and fees incurred in each part of the case.
 - 4. ADT paid \$15 million to settle the class claims.

5. ADT has incurred \$2,083,790.30 in attorney's fees and costs to defend the class action. The breakdown of that sum by law firm/vendor is as follows:

a.	Pepper Hamilton, LLP	\$1	,790,473.12
b.	McGuire Woods	\$	8,520.00
c.	Beveridge & Diamond, P.C.	\$	105,172.16
d.	Special Counsel	\$	152,296.08
e.	DiscoverE-Novitas	\$	23,686.99
f.	IKON Office Solution	\$	3,641.95

6. As of July 14, 2014, ADT has incurred \$189,514.41 in attorney's fees and costs to date to prosecute this third-party indemnity action. ADT will continue to incur fees and costs in the prosecution of this action as it continues in this Court. The breakdown of that sum by law firm/vendor is as follows:

a.	McNew, P.A.	\$ 165,796.55
b.	Polsinelli Shughart P.C.	\$ 4,382.50
c.	DiscoverE-Novitas	\$ 18,391.14
d.	Veritext	\$ 944.22

- 7. ADT has received contribution or indemnification from certain third parties or their affiliates in an aggregate amount of \$7 million. ADT has produced to Elephant Group's counsel copies of the confidential settlement agreements between ADT and the third-parties with whom it settled.
- 8. ADT has sought indemnification or contribution from each of the remaining third party defendants. Aside from Elephant Group, all other indemnitors cannot be located, have dissolved, or are judgment proof.

FUTHER AFFIANT SAYETH NOT.

DATED: 1/14/14

HANNAH LIM
The foregoing instrument was subscribed and sworn to before me this 14 day of July 2014, by HANNAH LIM who is personally known to me or who produced as identification.
PATRICIA CAMPBELL MY COMMISSION # FF 0007 NOTARY PUBLIC, State of Florida EXPIRES: April 4, 2018 Bonded Thru Budget Notary Services by commission expires: